

**AFFIDAVIT OF SPECIAL AGENT CASEY ANDERSON IN SUPPORT OF
A CRIMINAL COMPLAINT AGAINST JEREMY DAVID HANSON**

I, Casey Anderson having been first duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since September of 2019. I am assigned to the Springfield, Massachusetts Resident Agency of the FBI’s Boston Division, where I am responsible for conducting investigations related to violations of federal laws, including interstate threats and hate crimes. My participation in these investigations has included using confidential informants and cooperating witnesses; executing search and arrest warrants; conducting victim and witness interviews; reviewing communication records and content; and conducting electronic and physical surveillance.

2. I respectfully submit this Affidavit in support of a Criminal Complaint charging that on or about October 2, 2021 through October 8, 2021, in the District of Massachusetts and elsewhere, Jeremy David Hanson (“Hanson”) did transmit in interstate commerce communications containing a threat to injure the person of another, in violation of Title 18, United States Code, Section 875(c) (Threatening Interstate Communications) (the “Subject Offense”).

3. The facts set forth in this Affidavit come from my personal observations and/or review of records and other evidence, my training and experience, and information obtained from other agents and witnesses. This Affidavit includes only those facts I believe are necessary to establish probable cause for the requested Criminal Complaint and does not include all of the facts uncovered during the investigation. Unless otherwise specified, all statements are in sum and substance, all dates are approximate, and all amounts are approximate.

The Subject Offense

4. Title 18, United States Code, Section 875(c) states: “Whoever transmits in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another, shall be fined under this title or imprisoned not more than five years.” 18 U.S.C. § 875(c).

Probable Cause That Hanson Committed The Subject Offense

5. As set forth below, I have probable cause to believe that between October 2-8, 2021, Hanson committed violations of the Subject Offense.

Merriam-Webster, Inc.

6. According to its website,¹ Merriam-Webster, Inc. (“Merriam-Webster”) is America's foremost publisher of language-related reference works. In addition to its award-winning dictionary site at www.Merriam-Webster.com, the company offers a diverse array of print and digital language references, including Merriam-Webster’s Collegiate® Dictionary, Eleventh Edition, which is America’s best-selling desk dictionary, and the online Merriam-Webster Unabridged, which is the successor to its famed Webster’s Third New International Dictionary. Merriam-Webster maintains its headquarters in Springfield, MA and additional offices in New York, NY. The company was founded in 1831 as a book-selling operation in Springfield, and has been in continuous operation since then.

7. Merriam-Webster’s web site contains a “Contact Us” page in which individuals can submit communications online at <https://www.merriam-webster.com/contact-us/email?auto=buying>. The “Contact Us” page permits users to input their name, e-mail address, technical information, and other information, and then to select a button (“Send To Merriam-

¹ <https://www.merriam-webster.com/about-us/faq>.

Webster”) that will communicate this information to the company. The “Contact Us” page on Merriam-Webster.com uses a fillable form that generates an email to the Merriam-Webster customer service team that is populated by the text placed in the fillable form. Because the fillable form generates the email, the email account listed in the email section of the message received by the customer service team may not be an active email address. Likewise, the username entered in the fillable form may not correlate to a username registered with Merriam-Webster.com.

8. Merriam-Webster’s website also features its online dictionary, the Merriam-Webster.com Dictionary, which is regularly updated and revised. The dictionary also contains engagement features specifically designed for the digital user, including a feature that permits users to comment on the dictionary’s content and word choices.

9. As set forth in greater detail below, between October 2-8, 2021, Merriam-Webster received various threatening communications submitted through its website’s “Contact Us” page and in the comments section for the Merriam-Webster dictionary webpages that corresponded to the word entries for “Girl” and “Woman.” The registered user listed for these communications was *@anonYmous*. In addition, *@anonYmous* posted additional comments on the Merriam-Webster website, including opinions about certain controversial topics and comments demonstrating bias against specific gender identities. *@anonYmous* posted these bias statements on the comments section for the Merriam-Webster dictionary webpages corresponding to the word entries for “Boy,” “Girl,” “Female,” and “Trans Woman.” Some statements expressed hostility toward different gender identities and some threatened bodily harm to people.

10. On October 7, 2021, Merriam-Webster’s executive management became aware of the threatening communications. On October 8, 2021, after Merriam-Webster’s executive management learned of additional, more direct threats, Legal Counsel for Merriam-Webster

reported the threats to the FBI. As a result of the threats, executive management for Merriam-Webster closed its in Springfield and New York, and these offices remained closed for approximately five business days.

Threatening Statements to Merriam-Webster by @anonYmous

11. On October 2, 2021, at 12:44 a.m. EDT, Merriam-Webster received a threat posted on the comments section for the Merriam-Webster dictionary webpages corresponding to the word “Female” at <https://www.merriam-webster.com/dictionary/female>. The post read:

It is absolutely sickening that Merriam-Webster now tells blatant lies and promotes anti-science propaganda. There is no such thing as “gender identity.” The imbecile who wrote this entry should be hunted down and shot.

12. On October 8, 2021, at 11:17 a.m. EDT, Merriam-Webster received a threat posted on the comments section for the Merriam-Webster dictionary webpages corresponding to the word “Girl” at <https://www.merriam-webster.com/dictionary/girl>. The post read:

The moron who created this fake definition should be hunted down and shot. I am sick and tired of these cultural Marxists denying science and destroying the English Language. Merriam-Webster headquarters should be shot up and bombed. Boys aren’t girls.

13. Merriam-Webster used a third-party application to run website reports, including information pertaining to posts. On October 25, 2021, a Senior Web Operations Engineer provided screenshots of the website report that identified the user of these posts.

14. According to the report, the October 2, 2021 threat was posted by a user who registered with Merriam-Webster.com using the username @anonYmous and who registered with

the email address Jarlaxleartemis1@gmail.com. According to the report, the IP address used for this post was 98.149.110.214. According to the report, the October 8, 2021 threat was also posted by @anonYmous and the IP address captured for the threat was also 98.149.110.214.

15. According to an IP lookup for IP address 98.149.110.214, the IP address 98.149.110.214 was owned by Internet service provider Spectrum/Charter Communications (“Charter Communications”).

16. According to Charter Communications records, from May 21, 2021, to January 15, 2022 (i.e., including October 2-8, 2021), IP address 98.149.110.214 was assigned to subscriber Lauren Zack (“Zack”) at _____ (“_____ Road”). Because Zack was assigned to this IP address up until the date of the Charter subpoena response, January 15, 2022, it is possible that Zack’s account was assigned to this IP address after January 15, 2022.

17. According to California Department of Motor Vehicles (“CADMV”) records, Hanson resides at _____ Road, _____. On May 27, 2020, March 2, 2021, and March 12, 2022, FBI agents investigators interviewed Zack, who stated that Hanson is her son and lives with her at _____ Road.

18. During her interview on May 27, 2021, Zack told investigators that due to the stresses of the coronavirus, and recent changes to medication, Hanson may be lashing out online and insisted that he poses no threat to the community because he is reclusive, she supervises him, and he has no access to weapons.

19. During her interview on March 2, 2021, Zack told investigators that Hanson was fixated on transgender issues and is prone to what she described as “verbal hyperbole.” In particular, Hanson complained to Zack about a Hasbro new toy. Zack also explained that Hanson

suffers from developmental disorders, including autism, and is unable to reason through the consequences of making statements that could be construed as threats.

Hanson's Interview on July 27, 2015

20. On July 27, 2015, FBI investigators interviewed Hanson in the presence of Zack and a medical psychiatric resident at University of California – Irvine Medical Center, who had determined that Hanson was fit to be interviewed. Hanson stated:

- a. He uses various websites that provide anonymous IP addresses.
- b. He regretted making any threatening statements online, including the following message that he posted on a Wikipedia page: “I will kill you, you anti-Semitic freak. I will rape your sister and bash her fucking skull in. Then I’ll fuck your mother and kill her too.”
- c. He similarly regretted that on October 23, 2014, he sent an e-mail to Irish politician Averil Power that stated, among other things: “Hope you enjoy getting raped by savage Muslims when Ireland falls to *sharia* law.”
- d. He repeatedly expressed remorse and indicated that he promised to refrain from sending any threatening remarks via social media or online in the future.

Threatening Statements by “Death to Marxists” Through Merriam-Webster’s “Contact Us” Page

21. On October 2, 2021 and October 8, 2021, Merriam-Webster also received through its “Contact Us” page two other threatening communications that resembled the content of the @anonYmous posts on those days.

22. On October 2, 2021 at 12:55 a.m. EDT, Merriam-Webster received the following threatening communication. The fillable form section for “from name” included the text “Death to Marxists,” and fillable form section for “from email” included the text

“death2marxists@gmail.com.” The communication read:

You [sic] headquarters should be shot up and bombed. It is sickening that you have caved to the cultural Marxist, anti-science tranny agenda and altered the definition of “female” as part of the Left’s efforts to corrupt and degrade the English language and deny reality. You evil Marxists should all be killed. It would be poetic justice to have someone storm your offices and shoot up the place, leaving none of you commies alive.

23. A Senior Web Operations Engineer at Merriam-Webster provided the header information for this message, but could not identify the log-in IP address because Merriam-Webster used a third-party system to collect this information.

24. On October 8, 2021, at 11:25 a.m. EDT, Merriam-Webster received the following threatening communication. The fillable form section for “From name” included the text “Death to Marxists.” The fillable form section for “From email” included the text “death2marxists@email.com.” The communication read:

I am going to shoot up and bomb your offices for lying and creating fake definitions in order to pander to the tranny mafia. Boys aren’t girls, and girls aren’t boys. The only good Marxist is a dead Marxist. I will assassinate your top editor. You sickening, vile tranny freaks.

25. According to Merriam-Webster’s website usage log, at the same date and time of this communication, a user accessed the company’s “Contact Us” with IP address 172.56.16.59 and with device identifiers for a Samsung SM-N950U running Linux; Android 9.

26. The IP address 172.56.16.59 was owned by T-Mobile US (“T-Mobile”). T-Mobile

was unable to provide a subscriber based on the IP address assignment. However, according to T-Mobile's records, during the period including October 1-8, 2021, Zack maintained an active T-Mobile cellular account with a mobile data package for cellular telephone number (562) 230-9620.

Attribution of Jarlaxleartemis1@gmail.com

27. As stated above, the registration e-mail address for @anonYmous on Merriam-Webster.com was Jarlaxleartemis1@gmail.com, and the IP address used to post the threatening statements on October 2, 2021 and October 8, 2021 was 98.149.110.214, which resolved to Charter Communications customer Lauren Zack, whose son was Hanson.

28. According to Google, Inc. ("Google") records for Jarlaxleartemis1@gmail.com, this e-mail address was subscribed to an alias: First name "Anon" and surname "Ymous." In addition, Google's IP logs for user sign-ins and sign-out occurring between May 15, 2021, and October 18, 2021 contained 19 sessions resolving to IP address assigned to Charter Communications and one session resolving to an IP address assigned to T-Mobile. According to Charter Communications records, the subscriber of the 19 IP addresses obtained from Google for Jarlaxleartemis1@gmail.com was assigned to the IPv6² block provided to Charter Communications customer Lauren Zack.

29. According to the Google records, Jarlaxleartemis1@gmail.com was linked by browser cookies to two other email addresses: jeremydhanson@gmail.com and quinsareth1@gmail.com. Browser cookies are data exchanged between a user and an internet site that can be stored by the site to allow the user to interact with the services of that site. Based on my training and experience, I know that browser cookies can be used by websites and service

² Internet Protocol version 6 (IPv6) is the most recent version of the Internet Protocol (IP), the communications protocol that provides an identification and location system for computers on networks and routes traffic across the Internet.

providers for a variety of functions, including website and account security, analytics, advertising, and personalization.

30. The Google records also contained device identifier information for the connection sessions for Jarlaxleartemis1@gmail.com. All of the IP addresses were associated with one of only two different device identifiers.

31. The first device identifier, a Samsung SM-N950U running Linux; Android 9, was connected to 16 of the sessions that resolved to the Charter Communications IP address addressed to Zack and one session that resolved to a T-Mobile IP address. This device identifier is consistent with the device identifier used to access Merriam-Webster's "Contact Us" page at 11:25 a.m. EDT on October 8, 2021. The second device identifier, a computer using Windows NT 6.1; Win64; x64; rv:89.0, was connected to three of the sessions that resolved to the Charter Communications IP address assigned to Lauren Zack.

Additional Threats Evidence

32. As set forth above, according to the Google records, Jarlaxleartemis1@gmail.com (the email address associated with *@anonYmous* on Merriam-Webster.com) was linked by browser cookies to two other email addresses: jeremydhanson@gmail.com and quinsareth1@gmail.com.

The ACLU Threat

33. On April 19, 2020, the American Civil Liberties Union posted a message related to absentee ballots and a lawsuit in Missouri. In response to this post, the ACLU received a response from Instagram user *@quinsareth1* that stated, "The ACLU is a shameless partisan hack that hates freedom, hates America. I'd like to go on a shooting spree in their offices."

34. According to Facebook records, the registered email account for Instagram user

@quinsareth1 was quinsareth1@gmail.com, and on April 20, 2020, (the day following the threatening post), *@quinsareth1* used IP 98.149.110.214 which is the same IP address used to post the threatening communications by *@anonYmous* on Merriam-Webster.com. According to Charter Communications, this IP address was registered to its customer Zack. In addition, on May 27, 2020, FBI agents interviewed Zack, who confirmed *@quinserath1* was Hanson's Instagram username.

The Land O' Lakes Threat

35. On April 26, 2020, an employee of Land O' Lakes, an agricultural company headquartered in St. Paul, Minnesota, reported the following threatening communications received by Instagram from the user *@quinserath1*:

- a. 9:44 p.m.: "Land O Lakes headquarters deserve to be shot up and bombed for turning into a cultural Marxist company that panders to political correctness."
- b. 9:46 p.m.: "*@landolakessktchn* Land O Lakes headquarters deserve to be shot up and bombed for turning into a cultural Marxist company that panders to political correctness."

The New York Rabbi Threat

36. On July 14, 2020, the New York City Police Department ("NYPD") informed the FBI that on July 12, 2020, a local rabbi had received threatening e-mails from Jeremydhanson@outlook.com. The email subject line read: "You're not Jewish. You're some deranged Marxist Faggot. You deserve a bullet in the head." The email body read:

I'd like nothing more than to fill you full of lead. You're a sickening kapo and a disgusting faggot. You state your "pronouns" in your Twitter profile. That identifies you as some kind of tranny

abomination and a radical Marxist. Your Marxism negates your Judaism, as Marxism is an anti-Semitic ideology. In short, you are pure evil, a aubhuman [sic] traitorous cockroach even more evil than the Nazis. You and your entire family should be gassed and your synagogue shot up and bombed.

37. According to Microsoft records, the email Jeremydhanson@outlook.com was registered to a Jeremy Hanson in California with the date of birth of According to the CADMV records, Hanson has a date of birth of and resides in California.

The Hasbro Threat

38. On March 1, 2021, an employee of Hasbro, a toy company with headquarters located in Pawtucket, Rhode Island, reported that on February 25, 2021, Hasbro received the following threatening messages received via Hasbro Pulse, a system used by the company to communicate with the public. Each of these messages were signed “Jeremy Hanson” and the email account listed as the sending address was Jeremydhanson@outlook.com.

a. 6:14 p.m. EST: “I am going to shoot up and bomb your headquarters for pandering to the tranny freaks. Mr. Potato head is male. You sickening tranny cultural narcissist need to be exterminated. Death to tranny [sic].” The IP address for this message was 40.92.46.72.

b. 7:51 p.m.: This threat provided identical language with the addition of “only figuratively.” The IP address for this message was 40.92.18.34.

39. On March 4, 2021, FBI agents interviewed both Hanson and Zack concerning the threats to Hasbro. Hanson stated:

a. He sent both threatening communications, but he did not intend to carry out the threat, and he sent the second “only figuratively” communication after realizing he had done something wrong.

b. He had difficulty controlling what he posted online when he became “angry,” and he posted online to express the “rage” he felt.

c. He understood there was a difference between expressing himself and threatening someone, he agreed he would have to find a different outlet for his feelings when he got angry about something he saw in the news, and he expressed remorse that law enforcement had to get involved.

40. Zack stated:

a. She believed Hanson, who was 32 years old at the time, had the maturity of someone between the ages of 13 and 16 years old.

b. Hanson was diagnosed with Asperger’s syndrome, anxiety, obsessive-compulsive disorder, and depression, and that Hanson took several psychiatric medications. However, it was difficult to get Hanson treatment because Hanson did not believe he had any kind of disorder.

c. Hanson did not have access to any weapons.

The Madison, Wisconsin Alderperson Threat

41. According to reports of the Madison (Wisconsin) Police Department (“MPD”), on August 8, 2021, a local elected official (the “Alderperson”) received a threatening email based upon the Alderperson’s role in removal of a monument. Specifically, on August 8, 2021 at approximately 2:01 a.m. CST, the Alderperson received an email message from an automated question form present on Madison’s District 8 City webpage. The email was sent using an

automated fillable form from an email address that was listed as reporting@cityofmadison.com. The email was entitled “Rocks aren’t racist, you stupid nigger” and the listed name of the user was “Rocks Aren’t-Racist.” The communication read:

Hey, you dumb nigger, you should be lynched. Stupid Marxist cunt.

You’re so retarded you actually believe two billion year old boulders are racist. Insane Marxists like you are destroying America. You stupid, crazed bitch, you deserve to be raped and lynched for tearing out that boulder.

42. According to the MPD report, as a result of the threat, the Alderperson was scared and taking active steps to protect themselves and their home. According to the investigation, the IP address used to access the fillable form on the District 8 website was 98.149.110.214, which was registered to Charter Communications’ customer Lauren Zack on August 8, 2021. This is also the same as the IP address used to post the comments by @anonYmous on Merriam-Webster.com.

43. On November 22, 2021, Madison Police Department investigators spoke to Zack, who explained Hanson’s diagnosis and indicated that she remembered Hanson mentioning being upset about the monument. Zack offered to speak to Hanson about the email and see if Hanson wanted to speak to investigators, but Hanson declined to be interviewed by the MPD.

The IGN Entertainment and DC Comics Threats

44. On October 12, 2021, the San Francisco (California) Police Department (“SFPD”) responded to a report of threatening communications at the corporate headquarters for IGN Entertainment (“IGNE”). IGNE is a video game and entertainment media publication company headquartered in San Francisco/ According to the report, IGNE received the threatening communications by a post to its webpage <https://www.ign.com/articles/superman-bisexual-lgbt->

[jonkent-dc](#) and by emails to its email address ign_general@ign.com. The employee believed the threats were posted in response to an IGN Instagram post stating “Exclusive: DC’s New Superman Jon Kent Comes Out as Bisexual.”

45. In total, IGNE received eight different communications from different, but related, usernames: Boycott-DC-Comics@mail.com, [Boycott-DC-Comics](#); [Boycott-DC-Comics1](#), Boycott-DC-Comics2@mail.com, and Boycott-DC-Comics3@mail.com. The posts were made by an individual or individuals with the username. The posts originated from three IP addresses owned by T-Mobile: 173.58.16.186, 172.58.17.174, and 172.56.17.222. The IP addresses were all owned by T-Mobile. Investigators determined that IP address 172.56.17.222 resolved to an approximate location near Los Angeles, California, but could not obtain locations for the other two IP addresses.

46. The posts read as follows:

- a. “I am going to shoot up and bomb your headquarters for discriminating against conservatives and silencing conservative speech. The only good Democrat is a dead Democrat. I will kill you all for discriminating against and silencing me for criticizing the radical homosexual agenda.”
- b. “I will Kill you for censoring me, and I will shoot up IGN headquarters.”
- c. “All Faggots Hate Free Speech, so they should all Be Killed.”
- d. “All Fags Need to be rounded up and gassed.”
- e. “The only good faggot is a dead one.”
- f. “I am going to shoot up the IGN offices for discriminating against and silencing conservatives. The Marxist oppression against Americans needs to end now.”

- g. “I am going to shoot up the IGN offices for discrimination against and silencing conservatives.”
- h. “Of course someone like you (read: radical Democrat anti-American traitor) doesn't have a problem with innocent children being corrupted by degenerate filth in the form of a villain being disguised as a "superhero" IGN is obviously a far-left extremist, cultural Marxist propaganda site that discriminates against conservatives and hates free speech. I will have to keep posting my comment, and if IGN keeps deleting it, I will shoot up their offices. The radical left needs to pay for silencing and oppressing conservatives.”

47. On October 16, 2021, a writer for DC Comics received threatening communications via Facebook Messenger from a Facebook user with the user name Jeremy Hanson and account URL www.facebook.com/jeremy.hanson.4 (the “Jeremy Hanson Facebook Account”). The messages read:

- a. “I am going to fucking kill you. I am going to rape your wife and decapitate her then blow up DC Comics headquarters.”
- b. “We are going to have a civil war and EXTERMINATE you cultural Marxists destroying America. TRUMP 2024”
- c. “I WILL BURN YOU ALIVE AND DECAPITATE YOU FOR MAKING SUPERMAN GAY. FUCKING FAGGOT”
- d. “I WILL FUCKING BOMN DC COMICS HEADWUARTERS [sic] AND ASSINATE [sic] THEIR CEO. FUCKING COMMIE FAGGOT TRASH.”

48. According to Facebook records for the Jeremy Hanson Facebook Account, the

account used two IP addresses on October 11 and 12, 2021, respectively: 2603:8000:6400:b600:4c81:23d6:060d:8c1c and 2603:8000:6400:b600:b053:53ea:7e52:9c0a.

Both IP address were owned by Charter Communications.

49. On January 16, 2021, an additional threat was received by several email address associates with DC Comics. The sending account was listed as ShootUpandBombDCComics@gmx.us.³ The subject line read: "I am going to shoot up and bomb your offices for ruining Superman." The body of the email read:

First, you turn him into a faggot. Now, you make him anti-American. You fucking Marxist pieces of shit. I will make you pay. I will kill [Comic Publisher 1] and rape and murder his wife.

50. On October 27, 2021, FBI agents interviewed Hanson in the company of his mother at their home at _____ Road. Hanson stated:

- a. He suffers from obsessive-compulsive disorder, Aspergers, anxiety, and depression, and he struggles with impulse control.
- b. He recently made threatening remarks online regarding the sexual orientation of Superman to DC Comics as well as IGN Entertainment.
- c. He understands the threatening remarks he makes online are illegal, but is unable to control himself or his emotions.
- d. He is usually able to vent his anger to his mother. However, after his mother has gone to bed, Hanson makes comments online without the added benefit of his

³ Open-source research identified the owner of the domain @gmx.us as 1&1 IONS. However, 1&1 IONOS informed the FBI that records related to the email ShootUpandBombDCComics@gmx.us were not maintained by 1&1 IONOS, but rather by a partner company operating out of Germany. The FBI did not obtain any further records related to ShootUpandBombDCComics@gmx.us.

mother as a filter or sounding board.

The Loyola Marymount University Threats

51. On January 7, 2022, the FBI was contacted by an investigator from the Loyola Marymount University (“LMU”) Public Safety Department, who reported that on January 6, 2022, two LMU professors (Professor 1 and Professor 2) had received threatening email communications using anti-LGBTQ and anti-Indian rhetoric. LMU is a private, Catholic, research University in Los Angeles, California.

52. The email sent to Professor 1 read:

You should be fired, you stupid cunt. You actually penalized a student for using CORRECT grammar! What would you have him do, nonsensically refer to God as a plural in the manner of mentally-ill tranny freaks who don’t understand basic English? You radical leftists who are trying to destroy the English language and destroy society are [sic] sickening and pure evil. You are a malignant tumor, a cancer eating away at our civilization. The only cure for your intolerant, abominable totalitarian lunacy is a bullet to the brain. Please do the world a favor and kill yourself, you crazed feminazi bitch.

53. The email to Professor 2 read:

- a. “Death to tranny freaks | Go back to India, you tranny faggot. You freaks aren't welcome here”
- b. “Gas all Marxists and LGBTs | I am going to kill you. I shall decapitate you then set your classroom on fire. Evil commie subhuman faggot. You had best be ready to die for forcing your deranged tranny ideology on normal

people. The only good tranny is a dead tranny.”

- c. “There are only two genders, and it’s not possible to switch genders. Transgenderism is a mental disorder. Facts don’t care about your feelings, you retarded, subhuman faggot. We will soon round up and gas you totalitarian Marxist freaks who are destroying America.”

54. According to the investigation, all of the emails were sent by a user with the IP address 98.149.110.214. As set forth above, this IP address is owned by Charter Communications and is the same IP address used to post the comments by @anonYmous on Merriam-Webster.com. According to Charter Communications records, the subscriber for this IP address on January 6, 2022 was Zack.

The Amnesty International USA Threats

55. On February 13, 2022, Amnesty International USA (“Amnesty”) reported that on February 11, 2022, Amnesty employees received two separate threatening e-mails.

56. The first threatening email was sent by Death2antisemites@mail.com. The subject of the email read: “Your offices deserve to be shot up and bombed.” The text of the email read:

You all deserve to die for your anti-Semitic lies about Israel. I will personally be traveling to your leader’s house and will assassinate the vile Marxist. You leftists are horrific anti-Semites. You deserve to be slowly tortured to death, cut open and eviscerated, and strangled with your own intestines. You are a racist, Marxist, Islamic supremacist organization that needs to be destroyed. It’s time for you hypocritical leftist anti-Semites [sic] to learn that your actions have consequences. We jews are tired of being lied to and

being used as the world's punching bag.

57. The second threatening e-mail was sent later in the day to the same Amnesty employees from Death2antisemites@gmail.com. The email read:

Once the COVID pandemic is over and you anti-Semites have returned to your offices, I am going to shoot your main office up.

Yes, I have a firearm. The only good anti-Semite is a dead anti-Semite.

58. The IP address associated with both emails was 98.149.110.214, which was set forth above was registered to Charter Communications customer Zack and is the same as the IP address used to post the comments by @anonYmous on Merriam-Webster.com.

The University of North Texas Threat

59. On March 3, 2022, the University of North Texas ("UNT") reported that earlier that day, its President received a threatening communication by email from Killallmarxisttrannyteachers@usa.com. The title of the email read: "You ought to be shot in the head and have your offices set on fire for supporting child genital mutilation and transgenderism." The body of the email read:

YOU LEFTIST FREAKS are the intolerant ones. Trannies are disgusting PERVERTS. Every single tranny freak should be gassed, along with their supporters. I will personally go to your university and start executing tyrannical leftist students and faculty who oppress conservatives. The only good Democrat is a dead Democrat.

60. Open-source research identified the owner of the domain @mail.com as 1&1 IONS. According to 1&1 IONOS records, on February 24, 2022 and March 1-3, 2022, the IP address

associated with Killallmarxisttrannyteachers@usa.com was 98.149.110.214, which was set forth above was registered to Charter Communications customer Zack and is the same as the IP address used to post the comments by @anonYmous on Merriam-Webster.com.

61. According to the 1&1 IONOS records, Killallmarxisttrannyteachers@usa.com had four associated e-mail accounts:

- a. DestroyWokeCorporations@mail.com;
- b. Killallmarxistcops@torontomail.com;
- c. englishmatters@gmail.com; and
- d. killmarxistaclupervs@dallasmail.com.

The Walt Disney Co. Threat

62. According to information received from Walt Disney Co. (“Disney”), on March 10-11, 2022, its Chief Executive Officer (“CEO”) received two threats by email.

63. The CEO received the March 10, 2022 email from DestroyWokeCorporations@mail.com – i.e., one of the associated e-mail accounts for Killallmarxisttrannyteachers@usa.com, the email account used for the UNT threat. The email subject read: “I am going to assassinate you and shoot up your corporate headquarters for promoting the horrific transgender ideology to children.” The body of the email read:

You Marxist corporatists are the enemies of America. You are controlled by the Democrats and the tranny mafia, and I will kill you and your entire family for promoting transgender child abuse. I know where you live, you evil sack of shit.

64. The CEO received the March 11, 2022 email from DestroyWokeCorporations@usa.com. The email subject line read: “I am going to shoot up and

bomb your headquarters for being a bunch of pedophile faggots who foist transgender ideology onto children.” The body of the email read:

You are a sickening, spineless woke corporation, and you all deserve to die. The only way to stop the destruction of America by woke corporations is through terrorism.

65. The header information for both e-mails identified the sender’s IP address as 98.149.110.214, which, I believe based upon my training, experience, and knowledge of the case, was assigned to Charter Communications subscriber Lauren Zack on March 10, 2022.

66. On March 16, 2022, at approximately 12:42 p.m. CST, Disney received a bomb threat by telephone from an apparently male voice using phone number (562) 370-3416. The caller stated:

Hey, I just learned that your company supports the transgender agenda and wants to brainwash children with gender ideology. So, just to let you know, I’ve left multiple pipe bombs at your corporate headquarters. See ya.

67. Opensource information identified Verizon Wireless as the service provider for the phone number (562) 370-3416. Verizon was unable to locate subscriber information for the number, but confirmed the use of the number related to a cellular tower in Los Alamitos, CA and identified the actual service provider as a Verizon subsidiary called Lively Jitterbug Communications (“Lively”). According to Lively records, the account for (562) 370-3416 was registered to Jeremy Hanson at _____ Road.

The USA Today / U.S. Department of Health and Human Services Threat

68. On March 21, 2022, USA Today, a member of a conglomeration of News Media

companies overseen by Gannett Co., Inc., and headquartered in Virginia, notified the FBI that on March 18, 2022, threat it received via Formstack. Formstack is a workplace productivity platform used by USA Today to submit corrections or suggested changes to USA articles.

69. According to the report, USA Today received the threat from an individual with the user name “Death to Leftist Journalists” who provided the email address DestroyWokeCorporation@usa.com – i.e., the same email used for the Disney threat on March 11, 2022. The communication read:

I am going to shoot up and bomb your offices for being a lying fake news rag that declared a man “woman of the year.” Then, I will assassinate that freak Richard Levine and blow up the HHS.

70. Representatives from Gannett Co., Inc., informed investigators that USA Today recently named Rachel Lavine, a transgender woman who is an Assistant Secretary of Health and Human Services for the Biden Administration, as one of its Women of the Year. Richard Lavine was the name used by Rachel Lavine prior to Lavine’s gender transition.⁴

The Eau Claire (Wisconsin) Area School Board Threat

71. On March 21, 2022, the President of the Eau Claire (Wisconsin) Area School District (“ECASD”) received a threat against a school board meeting via the ECASD contact form on its website. The contact’s name listed on the contact form was “Kill All Marxist Teachers.” The email listed on the contact form was Death2Marxists@gmail.com – i.e., the same email address listed in the threatening communication sent via the Merriam-Webster “Contact Us” page. The message stated:

⁴ As of March 27, 2022, Gannett Co., Inc., has been unable to provided IP information on the sender due to the use of Formstack. The investigation into the threat against USA Today continues.

I am going to kill you and shoot up your next school-board meeting for promoting the horrific, radical transgender agenda. It's now time to declare war on you pedos [sic]. I am going to kill you and your entire family.

72. The method used to submit the ECASD threat was also similar to the use of the fillable form on the "Contact Us" page on MerriamWebster.com. ECASD information technology personnel identified IP address 98.149.110.214 as logged on to the ECASD contact form when the message was sent. Based upon my training, experience, and knowledge of the case, I believe that at the time of the threat, Charter Communications assigned this IP address to its Lauren Zack. The company that manages the ECASD website also captured device information for the user who sent the threat from IP address 98.149.110.214. The device information is as follows: PlayStation 4 (Mozilla/5.0 (PlayStation; PlayStation 4/9.04) using AppleWebKit/605.1.15 (KHTML, like Gecko) Version/14.0 Safari/605.1.15).

73. On March 14, 2020, Zack told FBI investigators in a telephone call that the only digital device that Hanson could access was his Sony PlayStation.

Conclusion

74. Based on the information described above, I have probable cause to believe that on or about October 2-8, 2021, in the District of Massachusetts and elsewhere, Hanson committed violations of the Subject Offense, in violation of 18 U.S.C. § 875(c).

Sworn to under the pains and penalties of perjury telephonically:

Signed electronically with authorization from
FBI Special Agent Casey Anderson on April 12, 2022.

/s/ Casey Hunter Anderson
CASEY HUNTER ANDERSON
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me telephonically:

Dated: April 12, 2022

/s/ Katherine A. Robertson
KATHERINE A. ROBERTSON
United States Magistrate Judge
District of Massachusetts

Signed electronically with authorization from
Katherine A. Robertson, U.S. Magistrate Judge on April 12, 2022.



Certified to be a true and
correct copy of the original
Robert M. Farrell, Clerk
U.S. District Court
District of Massachusetts

By: Melissa M. Rivera
Deputy Clerk

Date: 4/12/2022